

**GOLDBERGER & DUBIN, P.C.**

ATTORNEYS AT LAW

401 BROADWAY, NEW YORK, NY 10013

(212) 431-9380

FAX (212) 966-0588

E-MAIL: GND401@AOL.COM

www.goldbergerdubin.com

PAUL A. GOLDBERG†  
LAWRENCE A. DUBIN†\*  
EDGAR L. FANKBONNERT

†MEMBER OF NY BAR  
\*MEMBER OF NJ BAR

March 16, 2020

*Via ECF*

Hon. Kimba M. Wood  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Ziyu Wang  
Docket No. 18-cr-799-05 (KMW)

Dear Judge Wood:

The defense respectfully requests that defendant Ziyu Wang's sentencing hearing, currently scheduled at 2pm on March 24, 2020, be continued for 30 days, to April 24, 2020. The defense needs additional time to discuss Mr. Wang's plea and sentence with the government in connection with a recent disclosure by the government and may need to further discuss the plea and sentence with Mr. Wang, which is complicated as a result of emergency measures currently in place in the Southern District of New York and throughout the Bureau of Prisons system. The government consents to his continuance.

Respectfully submitted,

/s/ Edgar L. Fankbonner

Edgar L. Fankbonner

Attorney for Ziyu Wang

cc: Lara Pomerantz  
U.S. Attorney's Office  
(via email and ECF)